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May 25, 2001

Ms. Magalie R. Salas  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

**Ex Parte: Deployment of Wireline Services Offering Advanced  
Telecommunications Capability – CC Docket No. 98-147**

**Implementation of the Local Competition Provisions in the  
Telecommunications Act of 1996 - CC Docket No. 96-98**

**Dear Ms. Salas:**

On May 24, 2001, Augie Trinchese, Ed Shakin, and the undersigned, representing Verizon, met separately with Kyle Dixon of Chairman Powell's office and Sarah Whitesell of Commissioner Tristani's office to discuss the DC Circuit Court's remand of issues related to collocation. The attached handout was used in the discussions.

Pursuant to Section 1.1206(a)(1) of the Commission's rules, an original and one copy of this letter are being submitted to the Office of the Secretary. Please associate this notification with the record in the proceedings indicated above. If you have any questions regarding this matter, please call me at (202) 515-2530.

Sincerely,

A handwritten signature in cursive script, appearing to read "W. Scott Randolph".

W. Scott Randolph

Attachment

cc: Kyle Dixon  
Sarah Whitesell

*Verizon Collocation Ex-Parte*

*Docket 98-147 / 98-98*

*May 24, 2001*

## *Space Assignment for Collocation Arrangements*

- The D.C. Court Order makes clear that LECs and not their competitors allocate space in LEC central offices:

“The Court rejected the idea that competitors, “over the objection of LEC property owners, are free to pick and choose space in LEC’s premises, subject only to technical feasibility.” This is a violation of LEC property rights and goes well beyond what is reasonably required by Sec. 251 (c) (6).”

“Indeed, the Court specifically found that there is no “reasonable justification” for a rule that prohibits LECs from “requiring competitors to use separate or isolated rooms or floors.”

- The ILEC needs to plan central office space to make optimum and efficient use of a limited resource for all carriers.
- The most wasted space is in collocation cages – average of 70 percent of space is unused.
- Space Assignment must take into account;
  - Protection of equipment and personnel
  - Security – access by persons not under ILEC’s control present new and different security problems
  - Grouping of like equipment and access to support facilities,
  - Environmental support system capacity
  - Building addition / expansion requirements
  - Ability to manage space give back requests & re-use of facilities

## *Space Assignment for Collocation Arrangements*

- No logic for prohibiting segregated space that is equal in quality and cost to other space in the office.
- Segregation is the only effective security measure
  - numerous security problems have already occurred
  - cameras and identification badges are ineffective and never preventive
- Commingling of collocator equipment in the ILEC's racks violates the statutory distinction between physical collocation and virtual collocation.

## *Space Assignment Policies*

- Collocation should be assigned first to separate floors and rooms if space is available.
  - Most efficient way to meet collocator needs
  - Permits Pre-Conditioning
  - Allows most effective security for both collocators and ILECs
  - No tangible “downsides”
  - Does not affect collocation costs
  - No impact on provisioning intervals
- Collocators have this right (caged collocation) and the ILEC’s rights cannot be inferior.
- Collocator’s need for reserved space should take into account the collocator’s growth rate for equipment installations and length of time that the space has gone unused.
- When space in a segregated room or floor is full, collocation should be allowed on the same floor as the ILEC’s equipment only if it can be separated by a barrier.
- Collocators should relinquish unused space that is not reasonably reserved for future use before placing collocator equipment in rooms or floors with ILEC equipment.

## *Type Of Equipment That Can Be Collocated*

- Equipment must be necessary for interconnection or access to UNEs.
- Collocation of unnecessary equipment would quickly exhaust space in the central offices.
- The “Necessary” standard would not include:
  - Functions that are not necessary for interconnection or access to UNEs
  - Stand Alone Switches
  - General purpose computers/ administrative equipment
  - ATM switches
  - Information Services or Enhanced Services Equipment
- List is not meant to be comprehensive, but simply demonstrates a bright line for types of equipment that should not be allowed.

### ***CLEC-to-CLEC Cross Connects***

- No statutory basis for allowing collocating carriers to connect equipment with other collocators.
- Not necessary for interconnection or access to unbundled network elements.
- Other options are readily available:
  - Shared Arrangements
  - Meeting at Own Premises
  - Purchasing Fiber from Alternative Providers
- There simply is not enough space in central offices to house other carriers' network hubs.